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Attorneys for Chapter 7 Trustee

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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
DISTRICT OF UTAH, CENTRAL DIVISION**

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In re:

KENNETH C. TEBBS

Debtor(s).

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ELIZABETH R. LOVERIDGE, CHAPTER  
7 TRUSTEE,

Plaintiff,

HSBC FINANCE CORPORATION, FDBA  
HOUSEHOLD FINANCE CORPORATION  
AND FDBA BENEFICIAL FINANCE  
CORPORATION

Defendant.

Bankruptcy No. 08-20546 JAB  
Chapter 7

Adversary Proceeding No.  
10-2108

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**AFFIDAVIT OF ALLEN R. PERL**

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STATE OF ILLINOIS                    )  
  ) ss.:  
COUNTY OF COOK                    )

Allen R. Perl, being sworn, states:

1. I am an attorney at law practicing in the State of Illinois and a member of Perl & Goodsnyder, Ltd (“Perl & Goodsnyder”), which is located at 14 North Peoria Street, Suite 2-C, Chicago, IL 60607-2644.

2. I submit this Affidavit on behalf of Perl & Goodsnyder in support of the motion to authorize its employment as special counsel to Elizabeth R. Loveridge, Chapter 7 Trustee (the “Trustee”).

3. The Trustee has requested special counsel to renew and collect a judgment against HSBC Finance Corporation. (the “Judgment”). The judgment debtor is in Illinois. Perl & Goodsnyder is willing to accept employment on the basis set forth in the application.

4. Perl & Goodsnyder has extensive and diverse experience and knowledge in representing Chapter 7 Trustees, including, collecting judgments and is well qualified to represent the Trustee.

5. The following services are or will be required from Perl & Goodsnyder:

- a. to advise and consult with the Trustee concerning questions arising in connection with the collection of the Judgment;
- b. to appear for, prosecute, defend and represent the Trustee’s interest in Illinois as necessary; and
- c. to assist in the preparation of such pleadings, notices and orders as may be required to collect the Judgment.

6. I have advised the Trustee that Perl & Goodsnyder is willing to serve as special counsel in these proceedings and to accept compensation for professional services rendered and expenses incurred in accordance with Sections 328, 330 and 331 of the Bankruptcy Code. Perl

& Goodsnyder intends to bill for its legal services in the case in accordance with its usual practice, which is a contingent fee of 33% of the amount collected, plus costs.

7. Perl & Goodsnyder understands that its compensation is subject to further order of the Court and will apply to the Court for compensation upon appropriate notice and hearing.

8. No promises have been received by Perl & Goodsnyder, or any member or associate of the firm, as to the compensation in connection with this case. Perl & Goodsnyder has no agreement with any other entity to share any compensation received by the firm in connection with this case.

9. Perl & Goodsnyder and its members represent no interest adverse to the Debtor, Kenneth C. Tebbs, or the estate and its creditors, insofar as I have been able to ascertain, in matters upon which the firm is to be engaged and has no disqualifying connection with the Debtor, its creditors, or any other party in interest, their respective attorneys, accountants or auditors

10. Accordingly, I believe that Perl & Goodsnyder is "disinterested" within the meaning of Section 101(14) of the Bankruptcy Code.

**SIGNATURE PAGE TO FOLLOW**

  
\_\_\_\_\_  
Allen R. Perl

Sworn and subscribed to before me on this 14<sup>th</sup> day October, 2013 by Allen R. Perl.

My Commission Expires:

06/05/16

  
\_\_\_\_\_  
Notary Public

Residing at: 14 N. Peoria St.

Chicago, IL 60615

